

UNITED STATES DISTRICT COURT  
For the Eastern District of Virginia  
Richmond Division

COURTHOUSE NEWS SERVICES	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil Action No. 3:21-cv-00460-HEH
	)	
KARL R. HADE, in his official capacity as	)	
Exec. Sec'y of the Office of Exec. Sec'y of the	)	
Supreme Ct. of Va., <i>et al.</i>	)	
	)	
<u><i>Defendants.</i></u>	)	

**DEFENDANT KARL R. HADE'S RULE 12(b)(6) MOTION TO DISMISS**

Defendant Karl R. Hade, by counsel and pursuant to Federal Rule 12(b)(6), hereby moves to dismiss Plaintiff's Complaint for failure to state either a claim or facts upon which relief may be granted. The reasons supporting this motion are set forth in an accompanying, contemporaneously filed memorandum of law.

Respectfully submitted,

EXECUTIVE SECRETARY KARL R.  
HADE

By: /s/ Robert B. McEntee, III  
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*\*Counsel of Record for Defendant Karl R.  
Hade*

**CERTIFICATE OF TRANSMISSION**

I hereby certify that on August 10, 2021, I will electronically file the foregoing Rule 12(b)(6) Motion to Dismiss with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

/s/ Robert B. McEntee, III